

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT
DISTRICT OF MASS.

VINCENT AMARA,)
Plaintiff)
)
v.)
)
AUDREY REVERT, AMTRAK, and)
CRAWFORD RISK MANAGEMENT)
SERVICE,)
Defendants)
)

CIVIL ACTION NO.: 04-10094 GAO

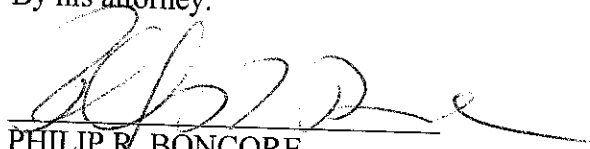
MOTION TO EXTEND PERIOD FOR SERVICE OF PROCESS

Now comes the plaintiff, by and through counsel, and respectfully requests this Honorable Court to allow this motion to extend period for service of process in the present action pursuant to FED. R. CIV. P. Rule 4(m). As reasons therefore, counsel states:

1. The plaintiff, by and through counsel, tried to serve the defendant, Crawford Risk Management Service on November 25, 2003, by sending the appropriate documents to its instate employer, Amtrak.
2. The Suffolk County Sheriff's Department returned said documents to plaintiff's counsel in January, 2004, stating that Crawford Risk Management Service was not located at the given address.
3. Plaintiff tried to locate an instate agent to accept service of process for the defendant, Crawford Risk Management Service, by contacting the defendant at its usual place of operation, located in Virginia, however plaintiff was still unable to locate any such person.
4. As such, plaintiff wishes to file a motion for alternative service on the defendant, Crawford Risk Management Service, whereby plaintiff, by and through counsel, will serve the defendant at its Virginia location.
5. Good cause to extend the period for service of process can be shown through the plaintiff attempting several times to no avail to locate an instate agent to accept service of process on behalf of the defendant, Crawford Risk Management Service.

WHEREFORE, counsel for the plaintiff now moves this honorable court to grant him an extension to effectuate service on the above named defendant.

Respectfully submitted,
Vincent Amara, plaintiff,
By his attorney.




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Date: 3/30/04

CERTIFICATE OF SERVICE

I, Philip R. Boncore, hereby certify that a true copy of the foregoing document(s) was/were served by first class mail, postage prepaid, to Sharon H. Church, Law Offices of John J. Bonistalli, One Financial Center, Boston, MA 02111, on March 30, 2004.



PHILIP R. BONCORE